

1 Jason C. Murray (CA Bar No. 169806)
2 Robert B. McNary (CA Bar No. 253745)
CROWELL & MORING LLP
3 515 South Flower St., 40th Floor
Los Angeles, CA 90071
4 Telephone: 213-443-5582
Facsimile: 213-622-2690
Email: jmurray@crowell.com
5 rmcnary@crowell.com

6 Jerome A. Murphy (*pro hac vice*)
7 Astor H.L. Heaven (*pro hac vice*)
CROWELL & MORING LLP
1001 Pennsylvania Avenue, N.W.
8 Washington, D.C. 20004
Telephone: 202-624-2500
9 Facsimile: 202-628-5116
Email: jmurphy@crowell.com
10 aheaven@crowell.com

11 *Counsel For ViewSonic Corporation*

12

13

14

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO

15

16

17

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

18

This Document Relates to:

19

20 *ViewSonic Corporation v. Chunghwa
Picture Tubes, Ltd. et al.*, No. 14-cv-02510

21

22

23

24

25

26

REDACTED VERSION OF DOCUMENT OF DOCUMENT SOUGHT TO BE SEALED

27

28

Master File No. 3:07-cv-05944-SC
MDL No. 1917

The Honorable Samuel Conti

Individual Case No. 3:14-cv-02510

**DECLARATION OF ASTOR H.L.
HEAVEN IN SUPPORT OF PLAINTIFF
VIEWSONIC CORPORATION'S
OPPOSITION TO PANASONIC
DEFENDANTS' MOTION TO DISMISS
AND TO COMPEL ARBITRATION**

DECLARATION OF ASTOR H.L. HEAVEN

I, Astor H.L. Heaven, hereby declare as follows:

1. I am an attorney with the law firm of Crowell & Moring LLP, which represents ViewSonic Corporation (“ViewSonic”) in the above-captioned action currently pending in the United States District Court for the Northern District of California.

2. I am a member in good standing of the District of Columbia and Maryland bars. I am admitted to appear in this Court *pro hac vice* in *In re Cathode Ray Tube (CRT) Antitrust Litigation*, Case No. 07-5944-SC, MDL No. 1917 (“MDL 1917”).

3. I submit this declaration in accordance with Local Rule 7-5, N.D. Cal., to set forth facts in support of ViewSonic's Opposition to Panasonic Defendants' Motion to Dismiss and Compel Arbitration.

4. The matters stated herein are true to my own personal knowledge, and, if called as a witness, I could and would competently testify thereto.

5.

6. Exhibit A is a true and correct copy of the OEM Agreement between ViewSonic and [REDACTED] dated June 1, 1997.

7. Exhibit B is a true and correct copy of the Supplier Agreement between ViewSonic and [REDACTED] dated May 1, 1997.

8. Exhibit C is a true and correct copy of the relevant portions (absent schedules and exhibits) of an OEM Agreement between ViewSonic and [REDACTED] dated December 1, 2001.

9. Exhibit D is a true and correct copy of the relevant portions (absent schedules and exhibits) of an OEM Agreement between ViewSonic and [REDACTED] dated January 29, 2002.

10. Exhibit E is a true and correct copy of the OEM Agreement between ViewSonic and [REDACTED] dated August 1, 1998.

11. Exhibit F is a true and correct copy of the relevant portions (absent schedules and

1 exhibits) of an OEM Agreement between ViewSonic and [REDACTED] dated March 5, 2001.
2

3 12. Exhibit G is a true and correct copy of the Declaration of Bonny Cheng.
4

5 Executed this 22nd day of September, 2014, in Washington, District of Columbia.
6

7 /s/ Astor H.L. Heaven
8 Astor H.L. Heaven (pro hac vice)
9

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28